

REMARKS

Applicants respectfully request reconsideration of the above referenced application in light of the proposed claim Amendments and Remarks that follow. Claims 1, and 23-26 have been amended. Claims 1-5, 8, 10-16 and 21-31 are now pending in this application.

In the Final Office Action dated May 14, 2008 (the "Final Office Action,") claim 1 was rejected under 35 U. S. C. 112, first paragraph, as failing to comply with the written description requirement. Claims 1, and 23-26 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Claims 1-5, 8, 10-16, 21-24, 26, 27, 30, and 31 were rejected under 35 U.S.C. 103(a) as being unpatentable over "Access 97 Bible" (hereinafter "Access") in view of Stein et al. (U.S. Patent No. 5,978,779, hereinafter "Stein"). Applicants respectfully traverse each of the rejections. Claims 25, 28, and 29 were rejected under 35 U.S.C. 103(a) as being unpatentable over Access in view of Stein, and further in view of McCoy et al. (U.S. Patent No. 5,649,116, hereinafter "McCoy").

Applicants respectfully traverse each of these rejections.

The undersigned's Remarks are preceded by related comments in the Office Action, presented in small bold-faced type font.

In order to discuss the differences between the claimed invention and art cited in the Final Office Action, the undersigned contacted the Examiner to request an interview with the participation of inventor Robert Casper and technical expert John Hendy, both of Morgan Stanley. The Examiner courteously granted the request. The interview took place on October 9, 2008.

A) Summary of the interview with the Examiner on October 9, 2008:

The undersigned as well as Robert Casper and John Hendy extend their appreciation for the time and opportunity granted by the Examiner to discuss the outstanding issues regarding this application.

During the course of the interview, Robert Casper, John Hendy and the undersigned discussed the differences between Applicants' claimed invention and the Access, Stein and McCoy references cited by the Examiner. The arguments presented, as explained to the Examiner in the course of the interview are detailed below in the section pertaining to the 35 USC § 103 claim rejections.

B) Applicants' response to the rejections in the Final Office Action:

Claim rejections - 35 USC § 112

Claim 1 is rejected under 35 U. S. C. 112, first paragraph, as failing to comply with the written description requirement. The claim contains subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention. The specification does not describe a system comprising computer-readable media encoded with a data structure for causing the computer to receive data and transmit data to a data storage system, as recited in claim 1. Applicant describes "computer programs that are executable on a programmable system... implemented in a high-level procedural or object-oriented programming language..." There is no mention of a system comprising computer-readable media encoded with a data structure.

Final Office Action, pg. 2-3.

Applicants respectfully submit that this rejection is moot in view of Applicants' amendment of claim 1 submitted herewith. Nevertheless, Applicants respectfully traverse this rejection. The Final Office Action states that "[t]he claim contains subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention" (Final Office Action, pg. 2, emphasis added). It is respectfully submitted that Applicants' Specification reasonably conveys the invention to one of skill in the art. For example, the Specification discloses the following:

Based on the above description, it will be obvious to one of ordinary skill to implement the system and methods of the present invention in one or more computer programs that are executable on a programmable system including at least one programmable processor coupled to receive data and instructions from, and to transmit data and instructions to, a data storage system.

Applicants' Specification, pg. 19, lines 14-17 (emphasis added).

One of skill in the art would recognize that in order for computer programs to be "executable on a programmable system", as stated in the Specification, such computer programs must necessarily be stored in a computer-readable media encoded with a data structure. Thus, such level of detail is not necessary to be explicitly disclosed in the Specification, as such disclosure would only represent a burden for one of skill in the art. Similarly, one of skill in the art would recognize that a source of power is necessary for a computer system to function, yet that level of detail need not be disclosed in a specification.

For at least the foregoing reasons, Applicants respectfully request that this rejection under 35 USC § 112 be withdrawn.

Claims 1, and 23-26 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claim 1, "the computer", recited in the preamble, has insufficient antecedent basis.

Claim 1, the claim recites "A system comprising computer-readable media encoded with data structure for causing the computer to..." A system is typically interpreted structure involving an interrelation of components. It is not clear what system is being claimed. If applicant intends to claim the computer readable medium, the claim should be a product claim (i.e., "A computer readable medium encoded with instructions for..."). If applicant intends to claim the system, a proper system claim would be directed towards the structure of the system, and not merely the function that the system performs.

Furthermore, a data structure is defined as "a physical or logical relationship among data elements, designed to support specific data manipulation functions." See MPEP 2106.01. As such it is not clear how a data structure would be capable of causing a computer to receive and transmit data, as recited in the claim.

It is further noted that, as claimed, the data storage system is non-functional descriptive material. The data storage system is not part of the claimed system or the claimed computer-readable media. Rather, the claim recites that the system transmits data to the data storage system. In this case, the structure of the data storage system would have no material effect on the system which is receiving and transmitting data, and therefore would not be given weight for determining patentability over the prior art. Dependant claims 2-5, 8, 10, and 22, further limit the data storage system, therefore is also considered non-functional. For the purposes of compact prosecution, the limitations of the data storage system will be addressed, however Examiner notes that the non-functional nature of the data storage system precludes the patentability of the claim for any limitations contained therein.

Examiner also notes that if Applicant intends to claim the data storage system, the limitations should be directed towards the structure of the system. While the limitations of the data storage system appear to be directed towards the data stored therein, the structure of the data storage system is unclear.

Claims 23-25, the claims recite "The system of claim 1 (23), programmed to..." It is not clear how these dependant claims further narrow or limit the parent claim. Since claim 1 is directed towards a system, a dependant claim should further define a part of the structure of the system. It is not clear what part of the system is being further defined by the dependant claims.

Final Office Action, pg. 3-5.

Applicants respectfully submit that the Office Action's rejections in regards to claims 1 and 23-26 are moot in view of the Amendment of these claims submitted herewith.

Claim 26, the claim recites "wherein when a new client transaction is being established and said transaction comprises a particular set of parties having defined roles..." It is not clear where in claim 11 a "new client transaction is being established," nor where nor how it is determined whether the transaction "comprises a particular set of parties

having defined roles.” Therefore it is not clear how the claim further narrows or limits the parent claim. Furthermore, “a new client transaction is being established” lacks antecedent basis.

Final Office Action, pg. 5.

Applicants respectfully submit that claim 26 has been amended to clarify how the claim further narrows or limits the parent claim. Thus, this rejection is moot.

With regards to the second rejection of claim 26, Applicants respectfully disagree that there is insufficient antecedent basis for “a new client transaction is being established” and that therefore the claim is rendered indefinite. Applicants respectfully submit that, as stated in the MPEP, the failure to provide explicit antecedent basis for terms does not always render a claim indefinite. If the scope of a claim would be reasonably ascertainable by those skilled in the art, then the claim is not indefinite:

2173.05(e) Lack of Antecedent Basis [R-5]

A claim is indefinite when it contains words or phrases whose meaning is unclear. (...) Obviously, however, the failure to provide explicit antecedent basis for terms does not always render a claim indefinite. If the scope of a claim would be reasonably ascertainable by those skilled in the art, then the claim is not indefinite. >Energizer Holdings Inc. v. Int'l Trade Comm'n, 435 F.3d 1366, 77 USPQ2d 1625 (Fed. Cir. 2006)(holding that "anode gel" provided by implication the antecedent basis for "zinc anode"); < Ex parte Porter, 25 USPQ2d 1144, 1145 (Bd. Pat. App. & Inter. 1992) ("controlled stream of fluid" provided reasonable antecedent basis for "the controlled fluid"). Inherent components of elements recited have antecedent basis in the recitation of the components themselves. For example, the limitation "the outer surface of said sphere" would not require an antecedent recitation that the sphere has an outer surface. See Bose Corp. v. JBL, Inc., 274 F.3d 1354, 1359, 61 USPQ2d 1216, 1218-19 (Fed. Cir 2001) (holding that recitation of "an ellipse" provided antecedent basis for "an ellipse having a major diameter" because "[t]here can be no dispute that mathematically an inherent characteristic of an ellipse is a major diameter").

A CLAIM IS NOT PER SE INDEFINITE IF THE BODY OF THE CLAIM RECITES ADDITIONAL ELEMENTS WHICH DO NOT APPEAR IN THE PREAMBLE

The mere fact that the body of a claim recites additional elements which do not appear in the claim's preamble does not render the claim indefinite under 35 U.S.C. 112, second paragraph. See In re Larsen, No. 01-1092 (Fed. Cir. May 9, 2001) (unpublished) (The preamble of the Larsen claim recited only a hanger and a loop but the body of the claim positively recited a linear member. The examiner rejected the claim under 35 U.S.C. 112, second paragraph, because the omission from the claim's preamble of a critical element (i.e., a linear member) renders that claim indefinite. The court reversed the examiner's rejection and stated that the totality of all the limitations of the claim and their interaction with each other must be considered to ascertain the inventor's contribution to the art. Upon review of the claim in its

entirety, the court concluded that the claim at issue apprises one of ordinary skill in the art of its scope and, therefore, serves the notice function required by 35 U.S.C. 112, paragraph 2.).
MPEP § 2173.05(e).

Applicants respectfully submit that while claim 26 does not provide explicit antecedent basis for “a new client transaction is being established”, the scope of claim 1 is not unclear, and is reasonably ascertainable by those skilled in the art. Thus, the claim is not indefinite. Applicants respectfully request that this rejection be withdrawn.

Claim rejections - 35 USC § 103

Claims 1-5, 8, 10-16, 21-24, 26, 27, 30, and 31 are rejected under 35 U.S.C. 103(a) as being unpatentable over “Access 97 Bible”, hereinafter Access, in view of Stein et al. , U.S. Patent No. 5,978,779.

Claim 1, Access teaches a data storage system (page 47: database) comprising files (page 48: tables), having a plurality of records related to a group (page 48), each of said plurality of records having information fields relating to one of a plurality of groups (page 48), wherein each information field comprises data fields for a value related to the record and information field (page 49: values). Access further teaches having multiple files, and a plurality of links to records in other files, specifying and operatively associating the relationship defined by the link (page 49: table relations).

Access fails to teach a party file with party information fields comprising party data fields, an account file having account records with account information fields and a link to party records, and a transaction file with transaction records, each transaction record having transaction information fields having transaction data related to transaction, and links to account records.

Specific data stored within the database storage system is considered nonfunctional descriptive material and is not given weight when determining patentability over the prior art. The type of data being stored, along with the types of data fields defined within each record is a design choice and does not make the invention novel over the prior art.

Furthermore, Access fails to teach receiving and transmitting data.

Stein teaches a system which receives data and transmits data to a data storage system (figure 3). Stein teaches a database and database records for a financial service provider, with fields relating to name and address, and including relationship fields indicating relationships between parties, account files with account records (figure 3), and transaction records linked to account records (figure 7). Stein teaches linking related clients, account, and transactions (column 3 lines 30-39). It would have been obvious to one of ordinary skill in the art at the time of the Applicant’s invention to modify the teachings of Access to include Stein because Stein describes a financial implementation of a relational database, as described by Access.

Final Office Action, pg. 6-7.

Applicants respectfully traverse this rejection.

Firstly, the Office Action states that "Access further teaches having multiple files, and a plurality of links to records in other files, specifying and operatively associating the relationship defined by the link" (Final Office Action, pg. 6). Applicants respectfully submit that Access does not disclose "a plurality of links to records in other files, specifying and operatively associating the relationship defined by the link", or more importantly yet, does not disclose "a party file having a plurality of party records, (...) wherein said plurality of party records comprise a party relationship data field indicating relationships between said parties", as required by claim 1, for example. Access simply discloses one relation between two tables, which in the example provided is between a Customer table and a Pets table. However, Access, following its example, does not teach that the Customer records comprise a customer relationship data field indicating relationships between customers.

The Final Office Action dismisses the "specific data stored within the database storage system" as non-functional descriptive material (Final Office Action, pg. 6) and continues asserting that "[t]he type of data being stored, along with the types of data fields defined within each record is a design choice and does not make the invention novel over the prior art" (Final Office Action, pg. 6-7). Applicants respectfully disagree with the assertion in the Final Office Action that a party relationship data field indicating relationships between parties would be nonfunctional descriptive material. Applicants respectfully submit that such relationship information determines how data, such as for example risk and profitability data, will be processed, permitting the system to manage client account information and account relationships effectively, easily leveraging the client account and transaction information to help manage the risk and assess the profitability of the financial institution's sales and trading businesses. Thus, party relationship data fields indicating relationships between parties, for example, impart functionality when employed as a computer component, and are therefore functional descriptive material in accordance with MPEP guidelines:

Descriptive material can be characterized as either "functional descriptive material" or "nonfunctional descriptive material." In this context, "functional descriptive material" consists of data structures and computer programs which impart functionality when employed as a computer component. (The definition of "data structure" is "a physical or logical relationship among data elements, designed to support specific data manipulation functions." The New IEEE Standard Dictionary of Electrical and Electronics Terms 308 (5th ed. 1993).) "Nonfunctional descriptive material" includes but is not limited to music, literary works, and a compilation or mere arrangement of data.

*Both types of "descriptive material" are nonstatutory when claimed as descriptive material per se, 33 F.3d at 1360, 31 USPQ2d at 1759. When functional descriptive material is recorded on some computer-readable medium, it becomes structurally and functionally interrelated to the medium and will be statutory in most cases since use of technology permits the function of the descriptive material to be realized. Compare In re Lowry, 32 F.3d 1579, 1583-84, 32 USPQ2d 1031, 1035 (Fed. Cir. 1994)(discussing patentable weight of data structure limitations in the context of a statutory claim to a data structure stored on a computer readable medium that increases computer efficiency) and >In re< Warmerdam, 33 F.3d *1354, < 1360-61, 31 USPQ2d *1754, < 1759 (claim to computer having a specific data structure stored in memory held statutory product-by-process claim) with Warmerdam, 33 F.3d at 1361, 31 USPQ2d at 1760 (claim to a data structure per se held nonstatutory).*

MPEP § 2106.01.

The Final Office Action (pg. 6) acknowledges that Access provides no teaching or suggestions regarding structuring data related to account information and transaction information. As Applicants clearly state in the Specification, one of the drawbacks of the prior art client account management systems is the inability of these systems to manage effectively multiple accounts of different but related entities (Specification, pg. 3). Another drawback of the prior art systems is the lack of precision in identifying the roles the various legal entities play in a particular client account (Specification, pg. 4). Access provides no remedy to either of these deficiencies. Thus, one of skill in the art would not turn to Access to find solutions to improve the efficiency in client account information and account relationships management to easily leverage the client account and transaction information to help manage the risk and assess the profitability of the financial institution's sales and trading businesses. Access provides no teachings or suggestions on how to structure data to manage financial risk effectively, as Applicants' claimed invention does.

The Final Office Action also recognizes that Access "fails to teach receiving and transmitting data" (Final Office Action, pg. 7) and refers to Stein to teach this part of the claimed invention. However, Stein does not cure Access' defects, which, as described earlier, go beyond failing to teach receiving and transmitting data.

The Final Office Action asserts that "Stein teaches linking related clients, account, and transactions (column 3 lines 30-39)." Applicants respectfully submit that Stein does mention "indirect addressing coordination of client/transaction/data ("linking") for related clients, accounts, transactions, and the like" (Stein, col. 3, lines 34-36). However, the cited portion of Stein provides no disclosure

relating to specific data structure. Applicants do not claim linking of client/transaction/data as a general concept but claim specific data structure with specific links.

Without the teaching of a specific data structure, the particular data structure claimed by Applicants' cannot be rendered obvious. To illustrate this, Applicants respectfully refer to Figure 2 of Stein, for example, which teaches data structure relating to client information. Applicants respectfully submit that the data structure taught by Stein does not permit to carry out data analysis a) of the same potency (i.e., thoroughness, versatility), b) with the same efficiency nor c) with the same accuracy as Applicants'.

With regards to potency, Stein does not teach data structure relating to "parties" with a legal name, jurisdiction and legal form, as required by claim 1, but to "clients". Making this distinction has functional significance because one determined party may be a client for a particular kind of analysis and may not be for another. Further, the possibility of analyzing a party from a perspective other than that of client is lost (e.g., trustee, custodian, guarantor, primer broker, etc...). Applicants' invention, on the other hand, starts from the premise of a "party" (i.e., a legal entity not yet assuming a "client" or other type of relationship) and encourages the capture of all the roles a legal entity plays, as well as that legal entity's relationship to other legal entities in a legal or credit hierarchy. This information is then embedded in the data structure claimed by Applicants.

In addition, Stein's data structure does not teach or suggest an account as able to have one or more legal entities playing a variety of roles on a single account. In other words, Stein does not teach or suggest "an account file having a plurality of account records, (...) wherein each of said plurality of account records comprises a plurality of links to said party records that specify and operatively associate the roles played by the linked parties for the account", as required by claim 1. Since the Final Office Action omits claim language by dismissing the structure claimed as "nonfunctional descriptive data", it fails to show that Stein teaches or suggests these limitations required by claim 1. Capturing different parties playing different roles on a single account provides an abundance of data about these relationships, which greatly improves the management of risk and profitability data. In fact, Stein teaches that a "typical relationship between a counterparty or FSP and a client can include one of the following types . . ." (Stein, col. 4, lines 46-48, emphasis added). Stein appears to suggest a "client" and singular

relationship per account, as shown by Figure 2, wherein each ledger within a client record is related to a single client/counterparty.

With regards to efficiency and accuracy, Stein appears to teach storing the account numbers on the client's record (Fig. 2, col. 9, lines 17-18), which as discussed by Applicants in the Specification, is a more cumbersome and error prone approach to data structuring and somewhat assumes a singular "client" relationship. While Stein requires entering the CCID of a client/counterparty and role separately, within each client record, in Applicants' invention, only one single entry for the party is needed into the role. As illustrated in Applicants' Figure 6, by entering the link to a party record within a particular role field within an account record, the information is gained of both, the identification of the party related to the account, as well as the role played by such party in that particular account. This is not only a more efficient system, but is also less error prone, as it leaves no room for lack of standardization in the spelling of the role played by the party or in potentially conflicting data between party requested by the CCID and the party entered into the role. Applicant's data structure is more potent by allowing analyses of all parties playing a particular role on one or more accounts, by using the standardized roles that the data structure affords. The role is embedded in the field. Stein, on the other hand, does not teach that.

In addition, Stein teaches to create different CCIDs for different roles for a single client/counterparty (Stein, col. 10, lines 10-13). This is a more cumbersome and error prone data structure, which may create inadvertent omissions or inconsistencies when gathering information pertaining to a single client/counterparty. In addition, because of the numerous different ways that the SAME client (party) may be spelled (eg. Lehman Brothers Inc, Lehman Bros Inc, Lehman Bros Incorporated), this precludes doing aggregate analyses across Lehman Bros in the Stein model, where Lehman Bros plays multiple roles, because of the different CCID's and the lack of standardized spelling. The data structure claimed by the Applicant is inherently more potent by overcoming this limitation by requiring a unique record for the client (party).

Moreover, Stein teaches to insert client/counterparty information in every client record where there is a relationship, rather than simply linking different client/counterparty records. This is a more cumbersome data structure than that claimed by Applicants.

Furthermore, Stein does not teach using separate files, as required by Applicants' claims.

As a further illustration to the fact that without the teaching of a specific data structure, the particular data structure claimed by Applicants' cannot be rendered obvious, Applicants respectfully refer to McCoy, which has also been cited by the Final Office Action to reject other claims. McCoy teaches data structure comprising links, which are also different from Applicants' and which impart different efficiency to data management than Applicants'. McCoy's data structure appears to result in duplication of data input, which is one of the drawbacks of the prior art Applicants' claimed invention is overcoming. For example, in Figure 2 of McCoy, account information appears in field 112 within account table 110 and in field 132 within customer relationship profile 130. This type of data structuring, as discussed by Applicants' in the Background section of the Specification, is prone to errors, and in addition, is less efficient than entering and updating information only once.

McCoy teaches a similarly cumbersome data structuring to represent customer relationships. McCoy resorts to creating a separate table for client relationships containing duplicated information (Figure 2) rather than inserting a link within each client record, as required by Applicants' claims.

In sum, the foregoing discussion shows that the generic statement in Stein cited in the Final Office Action (teaching "indirect addressing coordination of client/transaction/data ("linking") for related clients, accounts, transactions, and the like" Stein, col. 3, lines 34-36) cannot be used to render Applicants' invention obvious.

Moreover, McCoy does not cure Stein's and Access' other defects. McCoy does not appear to describe roles beyond that of a customer. As previously noted, the variety of roles that are described in Applicants' invention at an account level and beyond accounts defines a number of additional relationships that provides valuable information for efficient management of risk and profitability.

Furthermore, McCoy does not teach or mention data structure pertaining to transactions.

The lack of teaching of data structure pertaining to transactions, in the case of McCoy or accounts and transaction, as in the case of Access cannot be dismissed since as the foregoing discussion shows, different data structures can be conceived under the same general premises which are different and which do not result in the same degree of efficiency in data management.

For at least the foregoing reasons, Applicants respectfully submit that Access and Stein, alone or in combination with or without McCoy do not teach or render obvious Applicants' claimed invention. In fact, both Stein and McCoy exemplify what Applicants have previously argued during the prosecution of the present application, namely, that information can be represented in databases in many different ways. Not each one of these ways allow a user to manage the information represented by the data with the same efficiency. The deficiencies of the prior art were discussed by Applicants in the Background Section of Applicants' Specification (see paragraphs 7-11 in pg. 2-4). The data structures taught by Stein and McCoy, alone or in combination with Access do not overcome these deficiencies, and in fact demonstrate that Applicants' claimed data structure could not be simply derived by one of skill in the art, even if their teachings were combined. McCoy, for example uses data separated in different tables, wherein the tables are somewhat linked, as Stein describes in general terms in col. 3, lines 34-36. However, McCoy's data structure is not as efficient as Applicant's and it does not allow account relationships management to easily leverage the client account and transaction information to help manage the risk and assess the profitability of the financial institution's sales and trading businesses, as Applicants' claimed invention does, even though McCoy states that the computer-based system described is for managing risk among a plurality of accounts.

Hence, for at least the foregoing reasons, the arguments in the Final Office Action do not establish a prima facie case of obviousness for at least independent claims 1, 11, and 21. Applicants therefore respectfully request that the obviousness rejection be withdrawn and the pending claims be allowed.

For at least the foregoing reasons, the rejection of claims 2-5, 8, 10, 12-16, 22-24, 26-27, and 30-31 is also respectfully traversed. Claims 2-5, 8 and 22-24 depend directly or indirectly from independent claim 1, claims 12-16, 26-27 and 30-31 depend directly or indirectly from independent claim 11, and each defines further features and structure of the system and method, respectively. As such, these claims are patentable for the reasons noted above with respect to claims 1, 11 and 21 as well as for the additional features recited therein.

Claims 25, 28, and 29 are rejected under 35 U.S.C. 103(a) as being unpatentable over "Access 97 Bible", hereinafter Access, in view of Stein et al., U.S. Patent No. 5,978,779, and further in view of McCoy et al., U.S. Patent No. 5,649,116.

Access and Stein fail to teach identifying related parties, determining a total transaction amount, and determining a total risk exposure.

Claims 25, 28, 29, McCoy teaches identifying related parties that are related to a specified party, identifying all accounts that have as a principal, either the specified party or one of said related parties, determining a total transaction amount based on the transactions of the accounts identified, and determining the total risk exposure based on the total transaction amount (column 4 lines 32-52). It would have been obvious to one of ordinary skill in the art at the time of the Applicant's invention to modify the teachings of Access and Stein to include the total transaction limit monitoring of McCoy because McCoy teaches the benefits of monitoring the total exposure related to an individual, as opposed to the exposure of a single account (column 1 lines 40-58).

Final Office Action, pg. 10-11.

Claim 25 depends from independent claim 1, and claims 28 and 29 depend directly or indirectly from independent claim 11, and each defines further features and structure of the computer-system and method, respectively. As such, these claims are patentable for at least the reasons noted above with respect to claims 1, and 11, as well as for the additional features recited therein. No further discussion of the rejection of these dependent claims will be made at this time.

U.S. Patent Application Serial No. 09/785,596
Amendment in Response to the May 14, 2008 Final Office Action
Docket No. 80-20678073 (formerly known as 6208-003)

CONCLUSION

Claims 1, 11, and 23-26 have been amended. Claims 1-5, 8, 10-16 and 21-31 are now pending and believed to be in condition for allowance. Applicants have made a diligent effort to place this application in better condition for immediate allowance and notice to this effect is earnestly solicited. The Examiner is respectfully requested to reconsider the application at an early date with a view towards issuing a favorable action thereon.

The Commissioner is authorized to charge and fees required in connection with this submission to Deposit Account No. 50-0521.

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Respectfully submitted,



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